

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TONY KHOURY, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC.,
DROR NIV, and ROBERT LANDE,

Defendants.

Civil Action No. 1:17-cv-00916

YING ZHAO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC.,
DROR NIV, and ROBERT N. LANDE,

Defendants.

Civil Action No. 1:17-cv-00955

DAVID BLINN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC.,
DROR NIV, and ROBERT N. LANDE,

Defendants.

Civil Action No. 1:17-cv-01028

**JOINT DECLARATION OF ADI DAMTY AND ABED LATIF IN SUPPORT OF THEIR
MOTION FOR APPOINTMENT AS CO-LEAD PLAINTIFFS AND FOR APPROVAL
OF THEIR SELECTION OF LEAD COUNSEL**

adi damty
6 April 2017



The undersigned, under penalties of perjury under the laws of the United States of America, declare as follows:

1. We respectfully submit this Joint Declaration in support of our motion for appointment as Co-Lead Plaintiffs in the above-referenced actions (the "Actions") and approval of our selection of Block & Leviton LLP ("Block & Leviton") as Lead Counsel (the "Lead Plaintiff Motion"). We each have personal knowledge about the information in this Joint Declaration relating to our backgrounds.

2. I, Adi Damty, purchased FXCM Inc. ("FXCM") securities during the Class Period. As of February 6, 2017, my holdings in FXCM securities made up a significant portion of my investment portfolio. My certification and loss chart attached to the accompanying Declaration of Jeffrey C. Block, detail my estimated losses in FXCM securities.

3. I, Abed Latif, purchased FXCM securities during the Class Period. As of February 6, 2017, my holdings in FXCM securities made up a significant portion of my investment portfolio. My certification and loss chart attached to the accompanying Declaration of Jeffrey C. Block, detail my estimated losses in my transactions in FXCM securities.

4. We have been close friends and business confidants for more than ten years, and currently reside together in the same residence.

5. After we both reviewed the above-captioned complaints against FXCM, Dror Niv, and Robert Lande, and before the Lead Plaintiff Motion was filed on our behalf, we discussed with Block & Leviton the responsibilities of lead plaintiffs. Additionally, Adi Damty discussed via telephone with Block & Leviton a protocol for maintaining in regular contact with counsel to ensure that we incorporate an effective and efficient method of decision-making during the course of the litigation.

adi damty
6 April 2017



6. After discussing lead plaintiff responsibilities with counsel and together, we decided to move as a two-member group for appointment as Co-Lead Plaintiffs in these Actions and to propose Block & Leviton as Lead Counsel for the Class.

7. We believe that the Court should appoint us as Co-Lead Plaintiffs because we are investors with a significant interest in the outcome of the litigation and we have the capability and competency to oversee this litigation to a successful conclusion.

8. We are capable of actively participating in these Actions and are committed to doing so, in part by working closely with our Lead Counsel to obtain the best possible recovery for the Class in an efficient manner.

9. Before deciding to seek appointment as Co-Lead Plaintiffs, we carefully considered the merits of these actions and our respective losses, we also reviewed the above-captioned complaints and we discussed the merits of the case and our losses with our counsel.

10. We understand that one of our primary responsibilities will be overseeing Lead Counsel to ensure that the litigation is handled efficiently, and that the resulting fees and expenses are fair and reasonable, relative to the size, complexity, and risk of the litigation.

11. We understand that each of us could have chosen to pursue individual actions, made a motion for appointment as Lead Plaintiff individually, or taken no action and remained absent class members. However, based on our respective financial losses and desire to actively oversee this litigation, we affirmatively decided that it would be a benefit to ourselves and the Class we seek to represent if we sought appointment as Co-Lead Plaintiffs as a cohesive group.

12. We are committed to the zealous prosecution of this case and will remain actively involved in it, including through our attendance at deposition and trial, if necessary. We understand that if appointed we would both owe a fiduciary duty to all members of the putative class to provide

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6 April 2017



fair and adequate representation and to work with Lead Counsel to obtain the largest possible recovery for the putative class consistent with good faith and vigorous advocacy.

13. We each have knowledge of the requirements and responsibilities of lead plaintiffs in a securities class action. We have agreed to exercise joint decision making and to work together if appointed in these Actions to fairly and adequately protect the interests of the Class. We will also have periodic calls with counsel to discuss the status of the litigation and ensure its proper prosecution. We have selected Lead Counsel in this action based upon their experience and resources, and we are confident in our ability to work with our counsel to protect the interest of the Class.

14. We understand that, as the Co-Lead Plaintiffs in these Actions, we are subject to the jurisdiction of the Court and will be bound by all rulings by the Court, including rulings regarding any judgments.

15. As Co-Lead Plaintiffs, we shall be responsible for directing the activities of our selected counsel for the duration of the litigation, who shall:

- a. present the position of the Co-Lead Plaintiffs on all matters during litigation of the Actions;
- b. coordinate the initiation of and conduct discovery on behalf of Co-Lead Plaintiffs, including the preparation of interrogatories and requests for production of documents and the examination of witnesses in depositions;
- c. conduct settlement negotiations on behalf of Co-Lead Plaintiffs;
- d. negotiate and enter into those stipulations with opposing counsel necessary for the conduct of the litigation;
- e. retain expert consultants and witnesses;
- f. prepare and distribute periodic status reports to the Co-Lead Plaintiffs;
- g. maintain adequate time and disbursement records covering services as Lead Counsel; and

adi danty
6 April 2017



- h. perform such other duties as may be incidental to the proper and efficient coordination of the litigation or which may be authorized by further order of the Court.

adi clark
6 April 2017



Signed under penalties of perjury this 6 day of April 2017.

adi damty
Adi Damty

Signed under penalties of perjury this 6 day of April 2017.

[Signature]
Abed Latif

ABED LATIF